

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

vs.

GLEN D. BARNES,

Defendant.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Adversary Proceeding

Case No. 19-51038 (JKS)

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
TO VACATE ENTRY OF DEFAULT AGAINST GLEN D. BARNES**

The undersigned hereby certifies as follows:

1. On December 1, 2019, the Woodbridge Liquidation Trust (the “Trust”) commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) against Glen D. Barnes (the “Defendant”) by filing the *Complaint Objecting to Claims and Counterclaiming for Avoidance and Recovery of Avoidable Transfers, for Equitable Subordination, for Sale of Unregistered Securities, for Fraud, and for Aiding and Abetting Fraud* [Adv. Docket No. 1] (the “Complaint”). The Complaint seeks, *inter alia*, to object to claims and for the avoidance and recovery of prepetition transfers made by the Debtors to the Defendant.

2. On June 30, 2020, the Court entered its *Entry of Default* [Adv. D.I. 17].

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172).

3. After Plaintiff caused an Entry of Default to be entered against the Defendant, the Defendant hired counsel and said counsel requested that the Plaintiff vacate the Default. In consideration of vacating the Default, the Defendant, through his counsel, agreed to (1) file an answer; (2) select a mediator and mediation date; and (3) have the mediation within sixty days of the mediator being appointed.

4. The parties have therefore entered into a *Stipulation to Vacate Entry of Default Against Glen D. Barnes* (the “Stipulation”).

5. Attached hereto as **Exhibit 1** is a proposed form of order approving the Stipulation. The Stipulation is attached as Exhibit A to the proposed form of order.

6. Accordingly, the parties request that this Court enter the proposed form of order.

Dated: August 20, 2021
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Fax: 302-652-4400

Email: rpachulski@pszjlaw.com

acaine@pszjlaw.com

bsandler@pszjlaw.com

crobenson@pszjlaw.com

Counsel to the Woodbridge Liquidation Trust